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5 Attorney for Octavio Moreno Reyna

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7
8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (HONORABLE ROGER T. BENITEZ)

11 UNITED STATES OF AMERICA,) Criminal No. 08CR1636-BEN
12)
Plaintiff,) Date: June 30, 2008
13) Time: 2:00 p.m.
v.)
14)
OCTAVIO MORENO REYNA,) NOTICE OF JOINT MOTION TO CONTINUE
15) MOTION HEARING
Defendant.)

16 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, and JEFFREY D.
MOORE, ASSISTANT UNITED STATES ATTORNEY

17
18 PLEASE TAKE NOTICE that Defendant, Octavio Moreno Reyna, by and
19 through his Counsel, David J. Zugman, files the instant joint motion to
20 continue the motion hearing from June 30, 2008, at 2:00 p.m. to August
21 11, 2008, at 2:00 p.m..

22 Respectfully Submitted,

23
24 Date: June 25, 2008

S/David J. Zugman
David J. Zugman
Attorney for Mr. Reyna

PROOF OF SERVICE

I, the undersigned, declare that:

1. I am over eighteen (18) years of age; am a resident of the County of San Diego, State of California; and my business address is 964 Fifth Avenue, Suite 300, San Diego, California, 92101-5008.

2. I am effecting service of JOINT MOTION TO CONTINUE THE MOTION HEARING on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them:

Jeffrey Moore, Assistant U.S. Attorney
Office of the U.S. Attorney
880 Front Street
San Diego, CA 92101

3. I hereby certify that I have mailed the foregoing, by United States Postal Service to the following non-EFC participants in this case:

1. N/A

to the last known address, at which place there is delivery service of mail from the United States Postal Service.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 25, 2008.

S/David Zugman
DAVID J. ZUGMAN

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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 (HONORABLE ROGER T. BENITEZ)

11 UNITED STATES OF AMERICA,)	Case No. 08CR1636-BEN
)	
12 Plaintiff,)	Date: June 30, 2008
)	Time: 2:00 p.m.
13 v.)	
)	
14 OCTAVIO MORENO REYNA,)	JOINT MOTION TO CONTINUE THE
)	MOTION HEARING
15 Defendant.)	
)	

16
17 **THE PARTIES STIPULATE** to continue Mr. Reyna's motion hearing from
18 June 30, 2008, at 2:00 p.m. to August 11, 2008, at 2:00 p.m.. This is
19 the first continuance request for the motion hearing. The parties
20 anticipate arriving at plea agreement which will obviate the need for
21 the motion hearing. Further, the parties have matters to resolve which
22 is why the agreement has yet to be finalized. Mr. Reyna is in custody.
23 The new date and time have been cleared with this Court's clerk.

24 **IT IS SO STIPULATED:**

25 Dated: June 25, 2008

S/David Zugman

DAVID ZUGMAN
ATTORNEY FOR MR. REYNA

26 Dated: June 25, 2008

S/Jeffrey Moore

JEFFREY MOORE
ASSISTANT U.S. ATTORNEY